

The Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff

v.

SAKIRU OLANREWAJU AMBALI,

Defendant.

NO. CR23-5034-02 RJB

PROTECTIVE ORDER
[PROPOSED]

1. This Protective Order governs all discovery material in any format (written or electronic) that is produced by the government in discovery in the above-captioned case.

2. Discovery in this case is voluminous and includes the personal identifying information (PII)— such as Social Security numbers, driver’s license numbers, dates of birth, addresses, mothers’ maiden names, passwords, debit card and credit card account numbers, financial lines of credit numbers, bank account numbers, and personal identification numbers—of over 14,000 Americans. Redacting the discovery to delete PII prior to production would unnecessarily delay the disclosure of discovery to the defendants and would frustrate the intent of the discovery process.

3. Access to discovery material will be restricted to the Defense Team, with the limited exceptions discussed in paragraphs 4, 5 and 6 below. “Defense Team” shall

1 be limited to attorneys of record for the defendant and any of the following people
2 working on this matter under the supervision of the attorneys of record: attorneys,
3 investigators, paralegals, law clerks, testifying and consulting experts, and legal
4 assistants. For purposes of this Order, “Defense Team” does not include the defendant or
5 any official, employee, or agent of any foreign government. Defendant’s attorneys shall
6 inform any member of the Defense Team to whom disclosure of discovery material is
7 made of the existence and terms of this Protective Order. Members of the Defense Team
8 shall not provide copies of any discovery material to any persons outside of the Defense
9 Team, except as specifically set forth below.

10 4. Members of the Defense Team shall retain custody of all copies of the
11 discovery material, except as discussed below in paragraph 5. Members of the Defense
12 Team shall use discovery material only for the purpose of preparing a defense to the
13 charges in this action. Members of the Defense Team may review the discovery material
14 with defendant and witnesses for purposes of trial preparation, provided that witnesses
15 may review the material only in the presence a member of the Defense Team and may not
16 take notes regarding the content of the discovery material.

17 5. Defense counsel may provide discovery to defendant, subject to the
18 following conditions:

19 (a) Defendant shall use discovery material only for the purpose of assisting the
20 Defense Team with preparing a defense to the charges in this action;

21 (b) Defendant may not provide copies of the discovery material to any third
22 parties and may only review the discovery material either alone or in the presence
23 of the Defense Team;

24 (c) Defendant shall only be permitted to review his copy of the discovery material
25 in facilities approved by the Bureau of Prisons for this purpose, on Bureau of
26 Prisons-approved computers, or in hard copies maintained by Bureau of Prisons
27 staff while not in use by the defendant; and
28

(d) Defendant shall not be permitted to maintain a copy of the discovery material, or any notes made while reviewing that material, in his cell.

6. Any discovery material containing personal identifying information or personal financial information that the Defense Team files with the Court in connection with pre-trial motions, trial, or other matters before the Court, shall either be redacted to remove the personal identifying information or personal financial information, or shall be filed under seal and shall remain sealed until otherwise ordered by the Court.

7. This Protective Order will cover additional defendants in this case so long as they agree to be bound by the terms of this Protective Order and so indicate that consent by the execution of a supplemental stipulation, which shall be filed as an addendum or supplement to this Protective Order.

8. This Protective Order may be modified, as necessary, by filing with the Court a Stipulated Order Modifying the Protective Order or by order of the Court.

DATED: August __, 2023

ROBERT J. BRYAN
United States District Judge

Presented by:

s/ Cindy Chang
CINDY CHANG
Assistant United States Attorney